REMARKS

Applicants appreciate the Examiner's review of the present Application and respectfully request reconsideration based on the following remarks. Claims 1-20 are pending in the current RCE Application.

Applicants requested in their previous response of 8/23/01 that the Examiner list the Cheng reference on an Examiner's form PTO-892. The Examiner has not done this yet. Applicants respectfully again request the Examiner include the Cheng reference on the appropriate form in the next action.

The Examiner has maintained his rejection Claims 1-20 under 35 USC Section 103(a) as being unpatentable over Farros et al. in view of Cheng et al. (U.S. Patent No. 6,012,070).

Applicants traverse this rejection.

The Examiner again states that Farros teaches "a user interface component, to accept information from a user..." and "a graphic layout component, to process said information and to produce a graphic description file based on said information", and refers to Farros Fig. 1 element 100 and col. 4 lines 17-27. Applicants argued in the response on 8/23/01 that the files shown as element 100 Fig. 1 are not produced using information provided by a user. In Fig. 1, element 100 encompasses a plurality of files which are labeled "Front-end (offline) operations", and shows a plurality of files which are used by the Farros system during operation. Indeed, at Col. 4 line 17-18, Farros states "Front end operations 100 are performed offline before use of the printing system 110 by a user." Emphasis added. Applicants respectfully again point out that element 100 Fig. 1 of Farros is completely different from the graphic description file based on said information from a user, as claimed in Claim 1.

The Examiner states the Cheng discloses a design station allowing users to create a customized form or brochure in electronic format using templates containing graphics before transmitting the information to a remote printing installation, and that Cheng indicates the electronic format to be a Postscript file. The Examiner goes on to state that Cheng teaches using

only one graphics description file. Applicants disagree. Cheng does not disclose a graphics description file being the only file needed for a batch printing process, as recited in Claim 1 and Claim 14.

The system described in Cheng uses different graphics files for displaying graphics to the user (low resolution, and/or black and white), and for printing graphics in the final article (high resolution). The graphic files are separate, and are not transmitted to the printing installation. Cheng states:

"Transmitting the saved customized business form or brochure in electronic format to a printing installation without transmitting a document, physical graphics, or templates from the user station. And (e) at the printing installation imaging a physical copy (e.g. paper) of the customized business form or brochure in electronic format transmitted in step (d), the customized business form or brochure in physical form having high resolution graphics corresponding to the template graphics selected in step (a). Cheng, Col. 2 lines 39-59, emphasis added.

"Step 2: Any graphics that will be utilized to create the customized documents are converted to digital format (11), in both high (12) and low resolutions (13). High resolution graphics (12) are maintained at the printing facility. Low resolution graphics (13) are stored at the end user site."

Cheng Col. 5 lines 7-11, emphasis added.

"Step 4: Apply the template variables for the selected orders and create the customized documents.

DDS Production will automatically open the generic template which corresponds to the selected order. Using commercially available off the shelf composition software, such as Adobe PageMaker, the template variables are replaced in the proper areas of the generic template to create the customized document. During this process, all graphics are high resolution.

Step 5: Perform imposition which positions the document properly on the page.

Step 6: Create a print ready file, such as a Postscript file 110, for each customized document. This file is loaded to the printer for production. After production, the order is shipped to the customer. "

Cheng, Col. 11 lines 34-48, emphasis added.

"It will thus be seen that according to the present invention an effective method has been provided for the production of customized business forms or brochures by utilizing low resolution graphic templates, yet the forms/brochures produced being physical (e.g. paper) documents with high resolution color graphics." Cheng, Col 12 lines 11-16.

This makes it clear that Cheng does not transmit all the information needed to print the file. The electronic file does not include standardized graphics or other information. The graphics are low resolution at the user workstation, and will be replaced with high resolution graphics in the printing process. The Examiner states that since Cheng ultimately creates a postscript file at printing time, it would have been obvious to an artisan to construct a postscript file at the user site and transmit that. Applicants respectfully point out that Cheng teaches away from this idea of transmitting a complete file because Cheng emphasizes the feature of not having to transmit graphics and other information to the printing facility. See Col. 2 lines 39-59.

Applicants assert the Cheng suffers from the same problem as Farros: what is displayed to the user is not the same as what will be ultimately printed. Neither Farros or Cheng teach the advantage of "an image producing component, to process said graphic description file and produce said graphic image based on said graphic description file, said graphic image for display to said user by said user interface component", as recited in Claim 1. Farros and Cheng both display images to the user which are not created using the one graphics description file which is used for the batch printing process. The result is that what the user sees is an approximation of what the final printed result will be.

Applicants assert the same arguments apply to independent Claims 14 and 18, and therefore Claim 1, 14, and 18 and all claims dependent upon them are allowable.

Applicants believe that the claims recite allowable subject matter, and that the Examiner upon careful review will agree. Therefore Applicants respectfully request the Examiner to review the claims and these arguments. Allowance is respectfully requested. The Examiner is invited to telephone the undersigned, Applicants' Attorney, to facilitate advancement of the present Application.

Respectfully submitted,

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